## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

SHERRILYN KENYON,	
Plaintiff, )	
v. )	Civil Action No. 3:16-cv-0191
)	Judge Crenshaw
CASSANDRA CLARE, a/k/a JUDITH )	Magistrate Judge Knowles
RUMELT, a/k/a JUDITH LEWIS )	
)	Jury Demand
and )	•
DOES 1 through 50, inclusive,	
Defendants.	

# DEFENDANT'S MOTION FOR A STAY OF DISCOVERY PENDING MOTION TO DISMISS

Defendant Cassandra Clare ("Defendant" or "Clare") respectfully moves for a stay of discovery pending the determination of her Motion to Dismiss the First Amended Complaint (Doc. 41). As set forth in more detail in her Memorandum in Support filed simultaneously herewith, the Court has the discretion and inherent power to stay discovery until preliminary questions that may dispose of the case, such as lack of personal jurisdiction, are determined. In the present case, Defendant moved to dismiss the complaint in its entirety due, in part, to lack of personal jurisdiction. Contrary to Plaintiff Sherrilyn Kenyon's ("Plaintiff" or "Kenyon") opposition to the motion, Defendant believes that the motion is well-founded and should be granted.

Wherefore, Ms. Clare respectfully requests the Court grants the motion for a stay of discovery pending the determination of the motion to dismiss and all deadlines reset in accordance with such stay.

## Respectfully submitted,

#### /s/ John R. Cahill

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Counsel for Defendant Cassandra Clare

### CERTIFICATE OF SERVICE

I certify that on July 27, 2016, I served a copy of this document, via the Court's CM/ECF system upon the following:

James E. Mackler, Esq. William L. Campbell, Jr., Esq. FROST BROWN TODD LLC 150 3<sup>rd</sup> Avenue South, Suite 1900 Nashville, TN 37201

/s/ Samuel F. Miller